

**PELTON & ASSOCIATES PC**

Taylor B. Graham  
111 Broadway, Suite 1503  
New York, NY 10006  
Telephone: (212) 385-9700

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**ANNMARIE ABDELMONEM and DENNIS  
WASHINGTON, Individually and on Behalf  
of All Others Similarly Situated,**

**Plaintiff,**

**-against-**

**BUONA FORTUNA INC. d/b/a  
PORTOBELLO, JOE AMEN, FRANK  
AMEN and JOHN DOE CORP. d/b/a  
PORTOBELLO BANQUETS, Jointly and  
Severally,**

**Defendants.**

**ECF Case**

**13 Civ. 03070 (MSH)(MAH)**

**NOTICE OF PLAINTIFFS' MOTION FOR LEAVE  
TO AMEND THE COMPLAINT**

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, the declaration of Taylor B. Graham, Esq. and all pleadings and supporting materials filed herein, Plaintiffs hereby move the Court before the Honorable Michael A. Hammer, U.S.M.J. for an Order granting Plaintiffs' Motion for Leave to Amend the Complaint and ordering filing of Plaintiffs' Second Amended Complaint within ten (10) days from the date of the Order granting Plaintiffs' Motion.

For the Court's convenience, attached hereto as Exhibit "1," please find Plaintiffs' [PROPOSED] ORDER ON PLAINTIFFS' MOTION FOR LEAVE TO AMEND THE COMPLAINT.

Dated: New York, New York  
February 20, 2015

Respectfully submitted,

**PELTON & ASSOCIATES PC**

By: /s/ Taylor B. Graham  
Taylor B. Graham (TG 9607)  
111 Broadway, Suite 1503  
New York, New York 10006  
Telephone: (212) 385-9700  
Facsimile: (212) 385-0800

*Attorney for Plaintiffs, the FLSA Collective  
and Class*